

Exhibit 22

Rhode Island

Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Rhode Island – Meta Proposal

Search Terms: Meta made its most recent counterproposal on December 3, 2024 to the Rhode Island (i) Department of Education, (ii) Department of Health, (iii) Executive Office of Health and Human Services / Department of Human Services, (iv) Department of Behavioral Healthcare, Developmental Disabilities & Hospitals, and (v) Governor’s Office. At a high level, Meta’s proposal involves using search combinations that either (a) require a “Cause Term” to occur in the same document as a “Harm Term” or (b) require a “Youth Term” to occur in the same document as a limited set of “Mental Health Terms.”

The Rhode Island AG’s office previously agreed to use the set (a) combinations described above for at least the Department of Education, but disagreed with using the set (b) combinations and did not commit to using any terms for the other agencies.

| Harm Terms | |
|--|---|
| (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anx* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar " OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment* OR "pro-ana" OR "BMI " OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting* OR bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit* OR violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate* OR addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime OR staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users " OR " monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control" OR (eat* NEAR(5) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) OR (sleep* NEAR(5) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) OR (negative NEAR(5) (appearance OR experience OR affect* OR effect*)) OR (compar* NEAR(5) (appearance OR social OR other* OR negative)) OR (body NEAR(5) (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) OR (self NEAR(5) (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) | |
| # | Set (a) Combinations - Cause and Harm |
| 1 | ("social media" OR "social network" OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR |

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| | |
|---|--|
| | signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR "direct message") AND "Harm Terms" |
| 2 | (Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*") AND "Harm Terms" |
| 3 | (svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) AND "Harm Terms" |
| | Set (b) Combination - Youth and Mental Health |
| 4 | <p>(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)</p> <p>AND</p> <p>(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)</p> |

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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below for the Department of Health, Department of Education, and Governor’s Office. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Rhode Island AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for any of those agencies, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

The Rhode Island Attorney General’s Office has not proposed custodians for the Executive Office of Health and Human Services / Department of Human Services or the Department of Behavioral Healthcare, Developmental Disabilities & Hospitals, nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for those agencies. Accordingly, Meta requests that the Court require those two agencies to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

| Agency | Custodian | Title |
|-----------------|------------------------|--|
| Dept. of Health | Julia Brida* | Knowledge Services Contractor |
| Dept. of Health | Kelsea Tucker* | Comprehensive Suicide Prevention Grant Director |
| Dept. of Health | Jonathan Barkley* | Principal Public Health Epidemiologist |
| Dept. of Health | Andrea Bagnall Degos* | Interdepartment Project Manager |
| Dept. of Health | Dorinda Keene* | Assistant Director Financial and Contract Management |
| Dept. of Health | Karine Monteiro* | Senior Public Epidemiologist |
| Dept. of Health | Sounivone Phanthavong* | Program Administrator, Adolescent, School, and Reproductive Health |
| Dept. of Health | Samara Viner Brown* | Interdepartment Project Manager |

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| Agency | Custodian | Title |
|--------------------|--------------------------|--|
| Dept. of Health | Alisha Colella* | Assistant Director, Financial and Contract Management |
| Dept. of Health | Anna Tomasulo* | Emergency Communications Coordinator |
| Dept. of Health | Zach Garceau* | Regulation Coordinator |
| Dept. of Health | Kristine Campagna* | Associate Director of Health |
| Dept. of Health | Mike Simoli* | Assistant Director of Center for Healthy Homes and Environment |
| Dept. of Health | C. Kelly Smith* | Comprehensive Cancer Control Program Manager |
| Dept. of Health | Tara Cooper* | Interdepartment Project Manager |
| Dept. of Health | Tracy Jackson* | Senior Public Health Epidemiologist |
| Dept. of Education | Sandra Lopes* | Executive Director of Finance |
| Dept. of Education | Michael Hobin* | Director of College and Career Readiness |
| Dept. of Education | Mario Carreno* | Chief Operating Officer |
| Dept. of Education | Karen Cooper* | Senior Project Manager |
| Dept. of Education | Maureen Dizon* | Associate Chief of Staff |
| Dept. of Education | Phyllis Lynch* | Director of Instruction, Assessment, and Curriculum |
| Dept. of Education | Victor Morente* | Chief of External Affairs |
| Dept. of Education | Anadé Long* | Human Resources Director |
| Dept. of Education | Andy Andrade* | Special Assistant to the Commissioner |
| Dept. of Education | Rosemary Reilly-Chammat* | Director, Office of School Health and Wellness |
| Dept. of Education | Krystafer Redden* | Chief of Staff |

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| Agency | Custodian | Title |
|--------------------|---------------------|--|
| Dept. of Education | Lisa Odom-Villella* | Deputy Commissioner |
| Dept. of Education | Elizabeth Cruz* | Associate Chief of Staff |
| Dept. of Education | Mark Dunham | Chief Finance Officer |
| Dept. of Education | David Sienko* | Director of the Office of Student, Community and Academic Support |
| Governor's Office | Jeremy Chiappetta* | Senior Advisor |

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Search string for Department of Education

("social media" OR "social network" OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR "direct message")

Within 10 words of:

(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anx* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar " OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment* OR "pro-ana" OR "BMI " OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting* OR bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit* OR violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate* OR addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime OR staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users " OR " monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control" OR (eat* NEAR(5) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) OR (sleep* NEAR(5) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) OR (negative NEAR(5) (appearance OR experience OR affect* OR effect*)) OR (compar* NEAR(5) (appearance OR social OR other* OR negative)) OR (body NEAR(5) (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) OR (self NEAR(5) (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)))

For Department of Health and Office of the Governor:

Same as above AND

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Proposed Custodians

Office of the Governor:

1. Jeremy Chiappetta, Senior Advisor to Governor Daniel J. McKee (October 31, 2024)

Department of Education:

1. Sandra Lopes, Chief Equity and Diversity Officer
2. Michael Hobin, Director of College and Career Readiness
3. Mario Carreno, Chief Operating Officer
4. Karen Cooper, Senior Project Manager, School Building Authority
5. Maureen Dizon, Associate Chief of Staff
6. Phyllis Lynch, Director, Instruction Assessment & Curriculum
7. Victor Morente, Chief for External Affairs
8. Anadé Long, Chief for Human Resources & Equity
9. Andy Andrade, Special Assistant/Policy & Legislative Relations
10. Rosemary Reilly-Chammat, Director, Office of School Health and Wellness
11. Krystafer Redden, Chief of Staff
12. Lisa Odom-Villella, Deputy Commissioner, Instructional Programs
13. Elizabeth Cruz, Associate Chief of Staff
14. David Sienko, Director, Student Community & Academic Supports

Department of Health:

1. Julia Brida, Knowledge Services Contractor
2. Kelsea Tucker, Comprehensive Suicide Prevention Grant Director
3. Jonathan Barkley, Principal Public Health Epidemiologist
4. Andrea Bagnall Degos, Interdepartment Project Manager
5. Dorinda Keene, Assistant Director Financial and Contract Management
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8. Samara Viner Brown, Interdepartment Project Manager
9. Alisha Colella, Assistant Director, Financial and Contract Management
10. Anna Tomasulo, Emergency Communications Coordinator
11. Zach Garceau, Regulation Coordinator
12. Kristine Campagna, Associate Director of Health
13. Mike Simoli, Assistant Director of Center for Healthy Homes and Environment
14. C. Kelly Smith, Comprehensive Cancer Control Program Manager
15. Tara Cooper, Interdepartment Project Manager
16. Tracy Jackson, Senior Public Health Epidemiologist